ENERGY INDEPENDENCE NOW

May 18, 2006

California Energy Commission
Docket Unit
Attn: Docket No. 06-AFP-1
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DOCKET
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RECD. May 19 2006

From: Rick Margolin, Energy Independence Now

Subject: Re: Docket No. 06-AFP-1, "Alternative Fuels Plan"

Energy Independence Now would like to submit the following recommendations in regards to Docket No. 06-AFP-1, "Alternative Fuels Plan."

As part of the Alternative Fuels Plan's mission to increase the use of alternative fuels, the Energy Commission and its partner agencies are directed to "(e)valuate alternative fuels on a full fuel-cycle assessment…" EIN would like to request the following components be included in the biodiesel portion of this assessment.

1. In addition to biodiesel, other forms of diesel-fuel substitutes derived from 'eligible renewable diesel feedstocks/sources' (see 2) should be considered in the report. For purposes of this letter, biodiesel and the aforementioned diesel substitutes will be called 'renewable diesel fuels'.
2. Identify and provide definitions for 'eligible renewable diesel feedstocks/sources'. While it is fairly accepted that feedstocks derived from crops and waste biomass are considered 'renewable', there is ambiguity as to whether other types of feedstocks would qualify as such. For example, do municipal solid waste feedstocks qualify?
3. Various blends of renewable diesel fuels be evaluated:
    a. Blends of 1-2% renewable diesel should be evaluated. These blends may show a market presence in California as they can be used as lubricity-additives upon the phase in of ultra-low sulphur diesel. Blends of 2% also begin to demonstrate significant reductions of petroleum consumption and emissions.
    b. Blends of 5% renewable diesel should be evaluated: These blends represent the present-day threshold for warrantees provided by engine and vehicle manufacturers.
    c. Blends of 20% renewable diesel should be evaluated. With B20, substantial reductions of emissions and petroleum consumption are realized and engine manufacturers are already beginning to certify their products for use with B20. In addition, there is an emerging body of research which contradicts historical testing methods showing increases of NOx from B20 (please see number 4 below).

   d. Use of unblended (neat or B100) renewable diesel fuels should be evaluated and considered for use.

4. A re-examination of NOx emissions from biodiesel should be performed. There is an emerging body of research that contradicts past studies' conclusions that indicated NOx emissions increase with blends of B20 and higher. This new body of research from such sources as the National Renewable Energy Laboratory[i], Bay Area Air Quality Management District[ii], and the North Carolina State University[iii] demonstrates that biodiesel may actually be a strategy for reducing diesel NOx emissions.

Energy Independence Now appreciates your consideration of these issues for inclusion in the *Alternative Fuels Plan* report.

Thank you,

Rick Margolin
Associate Director

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[i] *Effects of Biodiesel on NOx Emissions*. McCormick, Bob, National Renewable Energy Laboratory. Presentation to California Air Resources Board Biodiesel Workgroup. June 8, 2005. http://www.nrel.gov/vehiclesandfuels/npbf/pdfs/38296.pdf

[ii] *Final Report: Biodiesel Feasibility Study for the Bay Area and Conduct a Biodiesel Pilot Project.* Teall, Russell, Biodiesel Industries for the Bay Area Air Quality Management District Professional Services Contract. Contract No. 2003-004. September 27, 2005.

[iii] *Final Report: Operational Evaluation of Emissions and Fuel Use of B20 Versus Diesel Fueled Dump Trucks.* Frey, H. Christopher, Ph.D. and Kwangwook Kim, North Carolina State University. North Carolina Department of Transportation Research Project No. 2004-18 FHWA/NC/2005-07. September 30, 2005. http://www.ncdot.org/doh/preconstruct/tpb/research/download/2004-18FinalReport.pdf